

From: "Ebright, Stephanie" <EBRIGHT.STEPHANIE@EPA.GOV>  
To: "Mackey, Cyndy" <Mackey.Cyndy@epa.gov>  
"Ingemansen, Dean" <Ingemansen.Dean@epa.gov>  
"Cora, Lori" <Cora.Lori@epa.gov>  
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"Sheldrake, Sean" <sheldrake.sean@epa.gov>  
"Zhen, Davis" <Zhen.Davis@epa.gov>  
Date: 1/9/2020 11:58:17 AM  
Subject: RE: Excerpt from ROD responsiveness summary, section 2.10.2

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The LWG did not dispute that.

Stephanie Ebright, Assistant Regional Counsel  
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**Subject:** RE: Excerpt from ROD responsiveness summary, section 2.10.2

Did we have dispute resolution on the food web model?

*Cyndy Mackey*  
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**Subject:** RE: Excerpt from ROD responsiveness summary, section 2.10.2

We are designing caps to address contaminated groundwater so that when it reaches surface water it will meet water quality standards, so to that extent we are addressing surface water in the ROD



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Really glad we are not engaging in Loren s questions. However LDW is marine water, different species, different state ARARs, different site conditions. There is no critiera in the Ncp to compare what you are doing on a site-specific basis to other NPL sites.

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I pointed out to Susan yesterday

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(b)(5), (b)(5) attorney-client



EPA concurs that natural

recovery is occurring within Portland Harbor and that it should be utilized in the sediment remedies, as evidenced by the fact that MNR represents the response action assigned to between 64 and 90 percent of the total area of the Site for all alternatives carried through the detailed analysis in the 2016 feasibility study report. However, the rate of natural recovery is expected to vary by location. It is important to have a representative data set that establishes baseline conditions prior to initiating the cleanup. Pre-design sampling will be used to ensure that the natural recovery is factored into the design and implementation of the sediment remedy and post construction monitoring will be used to evaluate natural recovery following remedy implementation. See also Sections 2.7.2 and 2.7.3 of this responsiveness summary.

Additional data will be collected during remedial design to assist in refining the remedy beyond the feasibility study level of analysis. EPA intends to evaluate additional data during remedial design to refine the delineation of contamination, selection and design of remedial technologies, and construction methods.



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